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July 9, 2019

VIA ECF

Hon. Kevin N. Fox
United States Magistrate Judge
US Courthouse - SDNY
40 Foley Square
New York, NY 10007

**Re: Actava TV, Inc., et al. v. Joint Stock Company "Channel One Russia
Worldwide" et al. (18-cv-06626)**

Dear Judge Fox:

We are counsel to Plaintiffs in the above referenced action. We write in accordance with Your Honor's Individual Practices to request a two-month extension of the schedule for the completion of all discovery in this action. We have consulted with counsel for Defendants, who have consented to this request. This is the third such request.

As we indicated in our second extension request (ECF No. 105) on June 4, 2019, the parties have exchanged discovery requests and responses. Plaintiffs' motion to compel (ECF No. 90) was fully briefed on May 1, 2019 and is pending. Defendants' motion to dismiss (ECF No. 68) is also pending before Judge Carter. On July 3, 2019, Plaintiffs filed a motion for issuance of letters rogatory (ECF No. 109) seeking relevant documents and a deposition from Actava's Canadian business partner, non-party Matvil Corporation.

Plaintiffs are advised that the letters rogatory process may take six weeks or longer. As such, the current deadline for fact discovery (August 2, 2019) is likely insufficient to obtain and review Defendants' and Matvil's documents following rulings on the pending motions, to schedule and hold all depositions, or otherwise to complete fact discovery. Accordingly, Plaintiffs believe that an extension of two months is warranted to allow completion of discovery.

A proposed amended scheduling order has been filed at ECF No. 110. We thank the Court for its consideration.

Respectfully submitted,

/s/ Toby Butterfield

Toby Butterfield

cc: Hon. Andrew L. Carter Jr., United States District Judge
All Counsel (via ECF)